

Daniel K. Snyder, Esquire
(Attorney NJ Id # 028172005)
**ARONBERG, KOUSER, SNYDER
& LINDEMANN, P.A.**
430 Route 70 West
Cherry Hill, NJ 08002
Telephone: (856) 429-1700
Attorney for Plaintiff

DOLORES WASHICK and
MICHAEL WASHICK, her husband

Plaintiff,

vs.

TARGET STORES,
and ABC CORPS 1-10 (fictitious names of
businesses and/or corporations which
cannot be ascertained at this time),
individually, jointly, severally and/or
in the alternative

Defendants.

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY
LAW DIVISION

DOCKET NO.: BUR-L-1732-21

Civil Action

COMPLAINT AND
DEMAND FOR JURY TRIAL

STATE OF NEW JERSEY TO:

**TARGET STORES
4 CENTERTON ROAD
MT. LAUREL, NJ 08054**

The Plaintiff named above, has filed a lawsuit against you in the Superior Court of New Jersey. The **Complaint** attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within **35 days** from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the Complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN 971, Trenton, New Jersey. A filing fee (\$175.00) payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available

from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services Offices in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

DATED: August 18, 2021

Michelle M. Smith
MICHELLE M. SMITH
SUPERIOR COURT CLERK

NAME OF DEFENDANT TO BE SERVED: **TARGET STORES**
4 CENTERTON ROAD
MT. LAUREL, NJ 08054

\$175.00 FOR CHANCERY DIVISION CASES OR \$175.00 FOR LAW DIVISION CASES

CLERKS ADDRESSES

Atlantic County, 1201 Bacharach Blvd., Atlantic City, NJ 08330
 Bergen County Justice Center, 10 Main Street, Hackensack, NJ 07601
 Burlington County Courts Facility, 49 Rancocas Road, Mt. Holly, NJ 08060
 Camden County Hall of Justice, 101 S. 5th Street, Camden, NJ 08103
 Cape May County Courthouse, Main Street, Cape May Courthouse, NJ 08210
 Cumberland County Court House, Broad and Fayette Streets, Bridgeton, NJ 08302
 Essex County Courts Building, 50 W. Market Street, Newark, NJ 07102
 Gloucester County Court House, 1 N. Broad Street, Woodbury, NJ 08096
 Hudson County Admin. Building, 595 Newark Avenue, Jersey City, NJ 07306
 Hunterdon County Court House, Main Street, Flemington, NJ 08822
 Mercer County Court House, P.O. Box 8068, Trenton, NJ 08650
 Middlesex County Court House, 1 Kennedy Square, New Brunswick, NJ 08903
 Monmouth County Court House, 71 Monument Park, Freehold, NJ 07728
 Morris County Court House, P.O. Box 900, Morristown, NJ 07963
 Ocean County Court House, 118 Washington Street, Toms River, NJ 08754
 Passaic County Court House, 77 Hamilton Street, Paterson, NJ 07505
 Salem County Court House, 92 Market Street, Salem, NJ 08079
 Somerset county court House, P.O. Box 3000, Somerville, NJ 08876
 Union county Court House, 2 Broad Street, Elizabeth, NJ 07207
 Warren County Courthouse, 2nd and Hardwick Streets, Belevidere, NJ 07823

LEGAL SERVICES OFFICES

Atlantic County	(609) 348-4200	(609) 345-3444
Bergen County	(201) 487-2166	(201) 488-0044 or 692-1011
Burlington County	(609) 261-1088	(609) 261-4862
Camden County	(856) 964-1002	(856) 964-4520
Cape May County	(609) 465-3001	(609) 463-0313
Cumberland County	(609) 692-2400	(609) 692-6207
Essex County	(201) 622-1513	(201) 622-6207
Gloucester County	(856) 848-5360	(856) 848-4589
Hudson County	(201) 792-6363	(201) 798-2727
Hunterdon County	(908) 782-7979	(908) 735-2611
Mercer County	(609) 695-6249	(609) 890-6200
Middlesex County	(609) 249-7600	(609) 828-0053
Monmouth County	(908) 747-7400	(908) 431-5544
Morris County	(201) 285-6911	(201) 267-5882
Ocean County	(908) 341-2727	(908) 240-3666
Passaic county	(201) 345-7171	(201) 278-9223
Salem County	(609) 451-0003	(609) 678-8363
Somerset county	(908) 231-0840	(908) 685-2323
Sussex County	(201) 383-7400	(201) 367-5882
Union County	(908) 527-4769	(908) 353-4715
Warren County	(908) 475-2010	(908) 267-5882

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BURLINGTON COUNTY
SUPERIOR COURT
49 RANCOCAS ROAD
MT HOLLY NJ 08060

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 288-9500
COURT HOURS 8:30 AM - 4:30 PM

DATE: AUGUST 12, 2021
RE: WASHICK DOLORES VS TARGET STORES
DOCKET: BUR L -001732 21

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON JAMES J. FERRELLI

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (609) 288-9500.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: DANIEL K. SNYDER
ARONBERG, KOUSER, SNYDER & LIN

430 ROUTE 70 W
CHERRY HILL NJ 08002

JUCPAC3

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Daniel K. Snyder, Esquire
(Attorney NJ Id # 028172005)
**ARONBERG, KOUSER, SNYDER
& LINDEMANN, P.A.**
430 Route 70 West
Cherry Hill, NJ 08002
Telephone: (856) 429-1700
Attorney for Plaintiff

DOLORES WASHICK and
MICHAEL WASHICK, her husband

Plaintiff,

vs.

TARGET STORES,
and ABC CORPS 1-10 (fictitious names of
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cannot be ascertained at this time),
individually, jointly, severally and/or
in the alternative

Defendants.

SUPERIOR COURT OF NEW JERSEY
BURLINGTON COUNTY
LAW DIVISION

DOCKET NO.:

Civil Action

COMPLAINT AND
DEMAND FOR JURY TRIAL

Plaintiffs, Dolores Washick and Michael Washick, residing at 4315 Bridgeboro Road, Township of Moorestown, County of Burlington and State of New Jersey by way of COMPLAINT against the defendants, Target Stores, a company licensed to do business in the State of New Jersey with offices located at 4 Centerton Road, Township of Mt. Laurel, County of Burlington and State of New Jersey and ABC CORPS 1-10, (fictitious names of businesses and/or corporations which cannot be ascertained at this time), individually, jointly, severally and/or in the alternative, says that:

FIRST COUNT

1. On or about the 18th day of August, 2019, the plaintiff, Dolores Washick was an invitee legally and lawfully on the premises of the defendant, Target Stores located at 4 Centerton Road, Township of Mt. Laurel, County of Burlington and State of New Jersey.

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2. As a legal invitee lawfully upon said premises, the plaintiff, Dolores Washick was caused to fall in the check out aisle resulting in injuries.

3. The defendant, Target Stores had and has a non-delegable duty and obligation to keep said premises properly maintained and safe.

4. The defendant, Target Stores, with actual and/or constructive notice was negligent in the supervisory maintenance, repair and general safekeeping of the premises and had negligently, carelessly and unlawfully permitted patrons to walk in that area so as to make it unsafe and dangerous to persons walking.

5. At the time and place aforesaid, the defendant, Target Stores was negligent in the supervisory maintenance, repair, and general safekeeping of the premises and allowed and/or permitted to exist certain hazardous and dangerous conditions such that this condition created a known hazard and dangerous condition at the defendant, Target Stores, and used by plaintiff and/or any other lawful and legal invitee walking through the area.

6. Defendant, Target Stores:

- (a) failed to warn persons, such as the plaintiff, Dolores Washick of dangerous conditions existing;
- (b) failed to put up warning signs that said dangerous conditions existed; and
- (c) failed to abate the hazards.

7. As a result of the aforesaid carelessness and negligence of the defendants, Target Stores, its agents, servants, employees or representatives, the plaintiff, Dolores Washick sustained severe personal injuries of both a permanent and temporary nature and has been and will in the future be forced to endure great pain and suffering, and has been and will in the future be forced to incur medical expenses in the care and treatment of said injuries and has been and will in the future be unable to continue with her normal course of activities.

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WHEREFORE, the plaintiff, Dolores Washick hereby demands judgment against the defendant, Target Stores in a sum which will reasonably compensate her for the injuries and damages sustained together with interest and costs of this suit.

SECOND COUNT

1. Plaintiff hereby repeats the allegations of the First Count and incorporates same into this Count as if set forth more fully herein.

2. Defendant, ABC CORPS 1-10 (fictitious names of businesses and/or corporations which cannot be ascertained at this time) is/are the owner(s) and/or lessees, or agents servants and/or employees of the property located at 4 Centerton Road, Township of Mt. Laurel, County of Burlington and State of New Jersey.

3. As a legal invitee lawfully upon said premises, the plaintiff, Dolores Washick was caused to fall resulting in serious personal injuries.

4. The defendant, ABC CORPS 1-10 (fictitious names of businesses and/or corporations which cannot be ascertained at this time) had a legal and contractual duty and obligation to keep said premises properly maintained and safe legal invitees such as plaintiff, Dolores Washick.

5. Said aisles and floors were to be maintained by defendant, ABC CORPS 1-10 (fictitious names of businesses and/or corporations which cannot be ascertained at this time).

6. The defendant, ABC CORPS 1-10 (fictitious names of businesses and/or corporations which cannot be ascertained at this time), had and has a non-delegable duty and obligation to keep said premises properly maintained and safe.

7. The defendant, ABC CORPS 1-10 (fictitious names of businesses and/or corporations which cannot be ascertained at this time) with actual and/or constructive notice of was negligent in the supervisory maintenance, repair and general safekeeping of the premises.

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8. At the time and place aforesaid, the defendant, ABC CORPS 1-10 (fictitious names of businesses and/or corporations which cannot be ascertained at this time) was negligent in the supervisory maintenance, repair, and general safekeeping of the business known as Target Store, 4 Centerton Road, Township of Mt. Laurel, County of Burlington and State of New Jersey and allowed and/or permitted to exist certain hazardous and dangerous conditions.

9. Defendant, ABC CORPS 1-10 (fictitious names of businesses and/or corporations which cannot be ascertained at this time):

- (a) failed to warn persons, such as the plaintiff, Dolores Washick of dangerous conditions existing;
- (b) failed to put up warning signs that said dangerous conditions existed; and
- (c) failed to abate the hazards.

10. As a result of the aforesaid carelessness and negligence, the plaintiff, Dolores Washick sustained severe personal injuries of both a permanent and temporary nature and has been and will in the future be forced to endure great pain and suffering, and has been and will in the future be forced to incur medical expenses in the care and treatment of said injuries and has been and will in the future be unable to continue with her normal course of activities.

WHEREFORE, the plaintiff, Dolores Washick, hereby demands judgment against the defendant, ABC CORPS 1-10 (fictitious names of businesses and/or corporations which cannot be ascertained at this time) in a sum which will reasonably compensate her for the injuries and damages sustained together with interest and costs of this suit.

THIRD COUNT

1. Plaintiff hereby repeats the allegations of the First and Second Counts and incorporates same into this Count as if set forth more fully herein.

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2. Plaintiff, Michael Washick, is the husband of plaintiff, Dolores Washick, and is entitled to her care, services, companionship and consortium.

3. As a result of the negligence of the defendants, the plaintiff, Michael Washick, has been deprived of the care, services, companionship and consortium of his wife, Dolores Washick.

WHEREFORE, plaintiff, Michael Washick hereby demands judgment against the Defendants, Target Stores and ABC Corporations 1-10 (fictitious names of corporations which cannot be ascertained at this time) in a sum which will reasonably compensate him for the injuries and damages sustained together with interest, attorney's fees and costs of suit.

FOURTH COUNT

1. Plaintiffs repeat the allegations of the First through Third Counts and incorporates same into this Count as if set forth more fully herein.

WHEREFORE, the plaintiffs, Dolores Washick and Michael Washick, her husband, hereby demand judgment against the defendants, Target Stores and ABC CORPS 1-10 (fictitious names of businesses and/or corporations which cannot be ascertained at this time) individually, jointly, severally and/or in the alternative, in a sum which will reasonably compensate plaintiffs, for the injuries and damages sustained together with interest and costs of suit.

ARONBERG, KOUSER, SNYDER &
LINDEMANN, P.A.

BY: 

DANIEL K. SNYDER, ESQUIRE
Attorney for Plaintiff

Dated: August 11, 2021

DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, DANIEL K. SNYDER, ESQUIRE is hereby designated as trial counsel in this action.

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JURY TRIAL DEMAND

Plaintiffs hereby request a trial by a jury as to all issues in this action.

NOTICE PURSUANT TO RULES 1:5-1(a) AND 4:17-4(c)

Please take notice that the undersigned attorneys, counsel for the plaintiffs, do hereby demand, pursuant to Rules 1:5-1(a) and 4:17-4(c), that each party herein serving pleadings and interrogatories and receiving answers thereto, serve copies of all such pleadings and answered interrogatories received from any party, including any documents, papers and other material referred to therein, upon the undersigned attorneys, please take notice that this is a continuing demand.

CERTIFICATION PURSUANT TO RULE 4:5-1

Pursuant to Rule 4:5-1, the undersigned hereby certifies that the above action is not the subject of any other pending lawsuit or arbitration proceeding. There are no other persons interested in the above action who have not been made a party to said action.

ARONBERG, KOUSER, SNYDER &
LINDEMANN, P.A.

BY:


DANIEL K. SNYDER, ESQUIRE
Attorney for Plaintiff

Dated: August 11, 2021

Civil Case Information Sheet

Case Details: BURLINGTON | Civil Part Docket# L-001732-21

Case Caption: WASHICK DOLORES VS TARGET STORES	Case Type: PERSONAL INJURY
Case Initiation Date: 08/12/2021	Document Type: Complaint
Attorney Name: DANIEL KENNETH SNYDER	Jury Demand: YES
Firm Name: ARONBERG, KUSER, SNYDER & LINDEMANN, PA	Is this a professional malpractice case?
Address: 430 ROUTE 70 W	Related cases per docket?
CHERRY HILL NJ 08002	If yes, list docket numbers
Phone: 8564291700	Do you anticipate a settlement or other disposition?
Name of Party: PLAINTIFF: Washick, Dolores	Are sexual abuse claims asserted?
Name of Defendant's Primary Insurance Company (if known): None	Are sexual abuse claims asserted?

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE USED FOR ANY PURPOSES OTHER THAN DETERMINING IF CASE IS APPROPRIATE FOR COURT

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the prevailing party?

Use this space to alert the court to any special case characteristics that may affect the court's management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO